

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

United States of America,

plaintiff,

v.

Todd Takata, [01]  
Michael Allen Bush, [02]  
Lani Ann Brewer, [03]

defendants.

Cr. No. 04-00134 SOM

U.S.C. §846 and 18 U.S.C. §2

DECLARATION OF COUNSEL

Stuart N. Fujioka, an attorney duly licensed before this Honorable Court, hereby declares under penalty of law that the following is true and based on personal knowledge.

1. I am counsel for defendant and am authorized to make this declaration.
2. Defendant is in compliance with the terms of his release and has made all of his court appearances.
4. Defendant has completed outpatient substance abuse treatment.
5. Defendant remains employed by David Bush, and has been residing on his own at 1868 Kahakai Dr. #310 Honolulu, HI 96814 ph. 941-1414.
6. His father Sam Bush is terminally ill at a hospital in Spain, where he resides.

- a. attached as Exhibit A is the letter dated 2/16/06, written in Catalan language, along with english translation which states at that time Mr. Sam Bush was gravely ill and unable to breathe on his own.
  - b. His condition has deteriorated even further and defendant will be securing written confirmation that his father's life expectancy is but a few days.
7. Defendant respectfully requests permission to retrieve his passport and travel to Spain from Sat. March 4, 2006 to Monday, March 13, 2006.
- a. He is booking flight arrangements with United Airlines and Lufthansa, and will provide a detailed itinerary upon reciept from his travel agent.
  - b. If allowed to travel, he will be staying with his sister, Rosemarie Bush, Avd. Gracia #2.-3.08172 St. Cugat Del Valles, Barcelona Spain, Ph. 011-34-655135638.

Dated: Honolulu, Hawaii, March 1, 2006.



Stuart N. Fujioka

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